

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 15-CR-20652  
CASE NO. 20-CR-20187

vs.

HON. SEAN F. COX

D-1 BILLY ARNOLD,

Defendant.

/

**GOVERNMENT'S RESPONSE TO ATTORNEY MARIA MANNARINO'S  
THIRD MOTION TO WITHDRAW (ECF No. 1980)**

On August 7, 2023, attorney Maria Mannarino filed a third motion to withdraw as counsel for defendant Billy Arnold. Attorney Mannarino has served as counsel for the defendant for over seven years, including conducting a trial in the fall of 2022, which resulted in a mistrial. On March 14, 2023, attorney Mannarino filed a motion to withdraw as counsel for the defendant (ECF No. 1906). On March 28, 2023, Judge Steeh conducted a hearing during which he heard from all interested parties. After the hearing, the Court denied counsel's motion to withdraw. (ECF No. 1917). On April 10, 2023, Attorney Mannarino filed a second motion to withdraw arguing that defendant has unequivocally lost confidence in her representation and that there has been a total breakdown in communication.

(ECF No. 1923). This Court denied that motion as well. (ECF No. 1945). On its face Attorney Mannarino's most recent motion to withdraw does not, under the circumstances, provide an adequate basis for withdrawal. The government recognizes, however, that it is not privy to the intricacies of counsel's relationship with the defendant. Accordingly, the government takes no position on the request of Attorney Mannarino and defers to the sound discretion of the Court.

DAWN N. ISON  
United States Attorney

/s/ Mark S. Bilkovic  
MARK S. BILKOVIC  
Assistant United States Attorney  
211 W. Fort St., Suite 2001  
Detroit, MI 48226  
Phone: (313) 226-9623  
[Mark.Bilkovic@usdoj.gov](mailto:Mark.Bilkovic@usdoj.gov)  
P48855

/s/ A. Tare Wigod  
A. TARE WIGOD  
Assistant United States Attorney  
211 W. Fort St., Suite 2001  
Detroit, MI 48226  
Phone: (313) 226-9191  
[Tare.Wigod@usdoj.gov](mailto:Tare.Wigod@usdoj.gov)  
P58479

s/ Rajesh Prasad  
RAJ PRASAD  
Assistant United States Attorney  
211 W. Fort St., Suite 2001  
Detroit, MI 48226  
Phone: (313) 226-0821  
[Rajesh.prasad@usdoj.gov](mailto:Rajesh.prasad@usdoj.gov)  
P68519

August 16, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that on August 16, 2023, the foregoing document was electronically filed by an employee of the United States Attorney's Office with the Clerk of the Court using the ECF system, which will send a copy to the applicable attorneys of record.

s/ Mark S. Bilkovic  
Assistant United States Attorney  
211 W. Fort Street, Suite 2001  
Detroit, Michigan 48226  
Phone: (313) 226-9623  
[Mark.Bilkovic@usdoj.gov](mailto:Mark.Bilkovic@usdoj.gov)  
P48855